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APPRAISAL REPORT

ON

UTILIZATION OF U.S. PRIVATE AND VOLUNTARY ORGANIZATIONS

IN

AID-FUNDED DEVELOPMENT ACTIVITIES

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OPERATIONS APPRAISAL STAFF
BUREAU FOR PROGRAM AND POLICY COORDINATION
A.I.D.

GLOSSARY OF ACRONYMS

AAC	Administrator's Advisory Council
ABS	Annual Budget Submission
ACVFA	Advisory Committee on Voluntary Foreign Aid
DAP	Development Assistance Plan
DPG	Development Program Grant
DSB	Development Support Bureau
GAO	General Accounting Office
GC	(Office of) General Counsel
IESC	International Executive Services Corps
IRS	Internal Revenue Service
LDC	Less Developed Country
OICI	Opportunities Industrialization Centers International
OPG	Operational Program Grant
PACT	Private Agencies Collaborating Together
PDC*	(Bureau for) Private and Development Cooperation
PHA*	(Bureau for) Population and Humanitarian Assistance
PPC	(Bureau for) Program and Policy Coordination
PVC	(Office of) Private and Voluntary Cooperation
PVO	Private and Voluntary Organization
TAICH	Technical Assistance International Clearing House

*PDC was established in November 1977 to replace PHA as the central bureau responsible for PVO activities and housing PVC

PREFACE

Comment was received from the four Geographic Bureaus, PPC, GC and PDC on the draft appraisal. The comments were addressed almost exclusively to the Recommendations Section of Part I and generally supported OAS positions. GC comment led to a tightening of language in Part II. Modifications made in this final report reflect comments expressed by the Regional Bureaus on the following matters:

1. While there was general support for the concept of matching grants, there was concern that the matching grant not replace the OPG as the principle mechanism of AID support for PVO activities. There was some concern that matching grants not be administered in a way that would conflict with USAID field programs.

2. They also expressed concern that capacitating grants be subject to a time limit, and that they not be converted into some form of continuing support for PVOs. There was some feeling that AID capacitating grant support be focused on improving the capacity of existing PVOs rather than devoted to new PVOs.

3. General support was also expressed for a definition of PVO which would emphasize U.S. private sector contributions, as well as the idea that organizations which do not fall within the definition, not be administered by PDC.

4. Finally, there was general agreement that ACVFA should be relieved of registration duties, and that the role of PVC ought to be more clearly defined.

PDC, the central bureau responsible for PVO activities, responded to the OAS report as follows:

> "The Bureau does not have detailed comments on the report and its recommendations. Our views have been well noted in the recent series of discussions on this subject and in the various memoranda that have been circulated.
>
> I want to acknowledge that the report served as an important stimulus to these recent discussions and was a catalyst in crystallizing the positions and policies which have emerged.
>
> With regard to some of the subjects discussed in this paper but not acted upon, it is my intention to urge that the registration function and the role of the Advisory Committee on Voluntary Foreign Aid be examined within the very near future. We will also be mindful

of your concern about PVC's functions as the Bureau for Private and Development Cooperation takes shape."

As indicated above, the draft report served as a catalyst for intensive discussions of AID policy towards PVOs. These discussions resulted in an Action Memorandum, dated February 8, 1978, to the Administrator and a policy statement by the Administrator on February 10, 1978, to a PVO conference. On that occasion the Administrator reaffirmed AID's commitment to the on-going partnership with the PVO community. The Administrator also made reference to the need for increased contributions from the U.S. private sector in support of PVO development activities overseas, and offered for PVO consideration a new mechanism under which AID grants might be available on a matching basis to support mutually agreed PVO-developed program proposals.

At a subsequent meeting with the PVO community, PDC/PVC announced a new policy thrust which would incorporate the idea of a significant level of contributions from the U.S. private sector into criteria for eligibility of U.S. PVOs to receive special AID funding. AID relationships with other PVOs would be examined on a case-by-case basis. PDC/PVC is now engaged in a comprehensive dialogue with the PVO community, looking to a mutually reinforcing partnership during the years ahead.

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UTILIZATION OF PRIVATE AND VOLUNTARY ORGANIZATIONS (PVOs) IN AID-FUNDED DEVELOPMENT ACTIVITIES

Part I - Summary

A. Purpose and Scope

This limited appraisal is designed to explore whether there are matters regarding AID relationships with PVOs in overseas development which need to be brought to the attention of Agency management. The appraisal is policy, management and organization oriented. Relationships between PDC/PVC and the PVOs are examined, as well as between PDC/PVC and the regional bureaus. The role of the Advisory Committee on Voluntary Foreign Aid (ACVFA) is explored, including the relevance of PVO registration to AID operations.

In 1974, AID adopted a policy of encouraging greater participation by U.S. PVOs in development assistance. In this appraisal we have sought to differentiate among the diverse organizations lumped together as PVOs; and recommend that, in implementing the policy, AID should provide special incentives to those organizations which can raise substantial funds for overseas development operations from the U.S. private sector. They would have a special status to initiate and carry out activities with a minimum of AID control. Other organizations, including cooperatives and those which cannot tap substantial funds from the private sector, would be viewed and utilized primarily as instruments in implementing AID-determined programs.

In this appriasal, we had the benefit of access to AAG/W working papers. We also had the benefit of the March, 1976, GAO report on PVOs, together with the AID response to that report. We attended two meetings of the ACVFA, met with key operating officials within AID, and with a sampling of PVO officials. Our field work was confined to visiting two LDCs - Colombia and Indonesia - to assess the development impact and relevance of PVO activities and PVO/USAID relationships.

Time constraints did not permit review of PVO project files. In this appraisal we do not discuss either the financial or the managerial competence of individual PVOs, nor do we take up questions of development strategy, e.g., such as whether AID should support PVO activities in "graduate" countries. Neither do we examine PVO participation in disaster relief, or in the use of traditional "subventions" covering Title II commodities, related ocean freight, shipment of donated goods, and use of excess property.

B. Background

For purposes of this appraisal we began with the Administrator's Reform Memorandum of January 24, 1972 which created PHA. At that time, the Administrator directed that a review be made of the AID relationship with PVOs, and that recommendations be made for strengthening PVO involvement in development work overseas. In a preliminary report to the Administrator in mid-1972, PHA noted:

" - that no satisfactory method existed for effectively interrelating potential PVO resources and PHA planning with regional bureau planning;

- that AID tended to view the PVOs not as partners in development but more as hired agents (often hired as a last resort) for quite limited services on an occasional project basis;

- that some evidence existed that the regional bureaus were interpreting AID's then new sectoral emphases in such a way as to actually reduce rather than increase AID's projects and funding involving PVOs;

- that the above tendencies were affecting adversely existing PHA funding arrangements with PVOs because of the fall-off in project activity and the consequent distortion of relationships between overhead costs and actual project activity."

In conjunction with Agency review of the mid-1972 report, PHA was encouraged to pursue a brokerage function in helping regional bureaus to identify additional projects suitable for PVO involvement. In addition, PHA was requested to identify issues which, for lack of resolution, might inhibit attainment of AID's objective of expanding PVO involvement in development work overseas.

By January 1973, PHA was able to present several PVO issues for deliberation by the Administrator's Advisory Council (AAC). PHA again asserted that regional bureau and mission interpretation of sectoral priorities often worked against PVO participation in LDC development. In addition, PHA urged stable, interregional, general support grants to cooperatives in order to increase their development role overseas.

In September 1973, PHA continued to argue that AID was not doing enough to assist and support PVOs. PHA denied any conflict between AID and

PVO objectives, and urged increased funding and increased scope for PVO activities. Moreover, the matter of PVO "independence" was seen by PHA as part of the new way for AID to carry out its business. PHA made a strong recommendation that AID provide general support grants to cooperatives, including funds for project design.

In April 1974, AID, ACVFA, and the PVOs gathered together in Rosslyn for a two-day discussion of evolving events. The AID Administrator set the tone for the meeting by asking for a "new relationship" with the PVO community, within "a framework of greater relevance and greater mutuality."

Immediately following the Rosslyn Conference, the Administrator issued a Policy Determination stating that "AID will encourage greater participation by private and voluntary organizations in development assistance". At that time, the Administrator announced two new grant mechanisms. Funds would be set aside to provide support (1) to improve PVO capacity to plan, design, manage and evaluate projects, (DPGs) and (2) to enable PVOs to develop and implement project proposals as approved by regional bureaus and missions (OPGs). In principle, this new initiative toward PVOs was seen as an AID response to the New Directions thrust of the FAA of 1973.

In September 1975, PHA addressed the AAC with another Issues Paper. This time PHA embraced the concept of "shared management" with the regional bureaus, under which PHA would take the lead in policy and procedural matters covering PVOs. PHA also took occasion to convey a considered PVO view; namely, that the idea of "partnership" had not sufficiently filtered down to the field, and that an intended autonomy for the PVOs was frequently undermined at the project implementation stage.

A GAO audit of May 1976 provided another opportunity for AID to grapple with the series of issues flowing from efforts to channel AID funds to PVOs. GAO contrasted the desire of the PVOs for independence, with AID responsibility for the prudent use of public funds. PVO confusion was seen to arise from the prevailing diversity of operational procedures among regional bureaus. GAO identified two central and continuing concerns for the attention of AID; namely, (1) the need for an operating definition of PVOs, and (2) the need to establish a relationship between AID support to PVOs and the capacity of PVOs to obtain funds from U.S. private contributors.

Finally, in June 1977, a PHA Task Force listed 15 issues pertaining to the PVO "problem" essentially the same issues which have plagued AID since 1972. The Task Force set forth a series of options for addressing each issue, but advanced no recommendations for resolution.

This then is the backdrop for the present PPC/OAS appraisal. First we make a number of Summary Findings on what we perceive to be the salient factors in the PVO dilemma. Next we condense these findings into General Conclusions which, in turn, provides the basis for Options and Recommendations. Part II elaborates on our Summary Findings.

In order to provide a perspective on the magnitude of the AID-administered PVO program, preliminary and summary data covering 1977 obligations of $484.4 million are presented in Attachment A. In Attachment B we show individual grants to the three PVOs which had the largest number of funding relationships with AID in FY 1977.

C. Summary Findings

As a general proposition, we find that AID in its work with U.S. PVOs currently wrestles with the same problems and concerns identified several years ago. The result is frustration among all parties -- the U.S. PVOs and, within AID, by PDC/PVC and the regional bureaus. We sense that the challenge of this appraisal is to surface and isolate for resolution those issues which have been submerged or compromised in the past.

1. Our central finding is that, in the absence of an operationally useful definition for a PVO, there can be no real communication within AID regarding an appropriate posture toward the PVO community.

2. We find that the element of private and voluntary contributions represents an essential ingredient to any definition of PVOs.

3. We find no useful benefit accruing to AID from PVO registration or from the operating role currently assumed by the ACVFA.

4. We find that PDC/PVC is trying to march to the beat of too many drummers as it seeks to play the role of chosen instrument within AID for relating to the PVO community.

5. From our field investigation, we conclude that most of the PVOs receiving AID support through operational and development program grants have moved from their traditional preoccupation with welfare and relief activities to the design of and experimentation with programs of micro-development geared to specific target groups in the poor majority.

D. Conclusions

From the selected findings cited above, there emerges one central conclusion; namely, that the PVO "problem" reflects the presence of an incomplete convergence of interests within AID, and between AID and the PVO community. In part, this results from imprecision regarding the kind of organizations which fall into the PVO envelope, and in part from an Agency abivalence regarding that posture which would best address the balance between PVO-centered and LDC-centered development programs. A subordinate conclusion is that AID management must cope with strong preoccupation of the PVO community for maintaining its independence while drawing on government funds.

In our explorations for a more effective way of conducting agency business with the PVOs, we identify several options vailable to Agency management.

E. Options

We perceive four discrete and credible options worthy of consideration:

1. Status Quo - Selection of this option would constitute reaffirmation of Pope's dictum: Whatever is, is right. It would constitute an endorsement of management by friction, where flexibility is purchased at the price of ambiguity, and where neatness gives way to eclecticism.

2. Withdrawal - The premise of this option is that the Policy Determination of May 1974 calling for affirmative action toward the PVO community has been superceded by events; that Agency management is prepared to reiterate the primacy of LDC-centered programs, with PVOs falling into the category of instruments for implementation of AID-determined programs.

3. Insulation - This option would seek to insure a strengthened role for PVOs by earmarking funds for increased and centralized PVO support, independent of endorsement from regional bureaus and field missions.

4. Bimodalism - Here we identify a two-track approach for dealing with U.S. PVOs. Essentially, this option postulates (1) a centrally-managed, AID matching grant component, and (2) operational program grants from regional bureaus and missions to individual PVOs. In addition, centrally-funded capacitating grants would be available to selected PVOs.

F. Recommendations

In our view, the fourth option offers the most promise for achieving a balance among competing AID interests. It offers a positive response

to Congressional urging for AID support to PVO involvement in the development process, and challenges the PVO community with their own rhetoric regarding the preservation of private and voluntary nature and the unique contribution they can make to development. This option facilitates a breakout from the present impasse regarding regarding a meaningful PVO role by providing coherence and integrity, and yet without sacrificing the raison d'etre of any concerned group. It also retains the OPG, which involves a collaboration between PVOs and field missions, as the principle mechanism for supporting PVO activities.

Our central purpose under this option is to propose criteria which would delineate those U.S. PVOs eligible to receive special AID benefits to "encourage greater participation" by PVOs in development activities overseas.

At this time we provide only a brief elaboration of the kind of decision package which flows from our preferred option:

1. In order to minimize the constraint imposed on AID by the Congressional injunction pertaining to registration, we would propose, in the first instance, to limit the notion of eligible U.S. PVOs to those falling under Sections of 501(c)(3) of the IRS Code.

2. Even within Section 501(c)(3), we would include for special benefits only those PVOs which rely for their revenue significantly on U.S. private grants and contributions. As a general proposition, AID would limit special benefits to those PVOs obtaining from U.S. private sources at least 20% of their overseas development expenditures, exclusive of AID-funded contracts.

3. In addition to the current OPGs, for which we propose no change other than that implicit in para. 2 above, AID would offer a Matching Grant arrangement in order to permit AID to test and demonstrate the validity of PVO uniqueness as a Third Channel for conducting development programs overseas.

4. Matching Grants for development activities would be centrally funded and centrally managed. Although we cannot at this time identify the magnitude of likely claims, we would expect an initial annual total of no more than $20 million. This amount could easily be made available without competing with OPGs and other high priority claimants for scarce AID funds. Since these would be program grants, we suggest that approval be at the Deputy Administrator Level, following review of the program proposal by PVC and the regional bureau responsible for LDCs in which the PVO intends to operate.

5. Criteria regarding PVO access to AID Matching Grants would take into consideration (a) the past "track record" of a PVO in carrying

out overseas development activities, (b) the magnitude of funds available to an applicant PVO from U.S. non-government sources, (c) the extent to which such U.S. contributions came from foundations or other intermediary sources, (d) the number of such contributors, (e) the extent to which the applicant PVO utilizes volunteers in the execution of its program, and (f) whether projects would be in the public or private sector. AID funds might be made available as a single, commingled grant, or divided between overhead and program costs. This would be a matter left for negotiation between PVC and the PVO, with PVO experience and administrative excellence constituting key factors for decision-making. In a similar vein, the time flow of AID Matching Grants would be open to negotiation in order to make allowance for patterns of PVO cash flow.

6. PVOs would be encouraged to make a contribution to Matching Grants of 50% of the total budget expenditures for overseas development work, including related overhead costs, but net of fund raising costs and project cost-sharing from host country sources. In no case, however, would the PVO contribution as measured above, be less than one-third of allowable expenditures. For purposes of Matching Grant calculations, traditional AID-financed grants and contracts with PVOs would be excluded.

7. In order to avoid a disproportionate allocation of AID matching funds to larger, more established PVOs, and in order to avoid administrative over-burden for AID, there should be both a ceiling and a floor on individual Matching Grants. Smaller and newer PVOs would be encouraged to form consortia in requesting support under Matching Grants.

8. PVC would also administer specific Capacitating Grants, as a modified DPG program; such grants would be phased out over a time, not exceeding five years, and would exclude PVO project development work overseas, without prior clearance from the cognizant regional bureau. Capacitating Grants would also be limited to PVOs falling under Section 501(c)(3) of the IRS, and receiving at least 20% of support for overseas development activities from private U.S. source. We would envisage this type of grant being used sparingly and focused on enhancing the development capabilities of existing PVOs.

9. In addition to Matching and Capacitating Grants administered through PVC, eligible PVOs also would be free to enter into negotiations with regional bureaus and missions with respect to OPG proposals. Agency policy regarding OPG guidelines would emanate from PPC, with appropriate inputs from PDC and the regional bureaus.

10. We find no benefit accruing to AID from PVO registration. Elimination of this burden from PVC would free up personnel for

higher priority work such as evaluation of PVO performance, operating a central PVO information system, liaison with regional bureaus, and playing the part of ombudsman on behalf of the PVO community.

11. Should AID conclude that it would be impolitic to propose to the Congress that PVO registration be abolished, then we would urge that this be made an exclusively AID responsibility. The objective would be to free up the Advisory Committee for liaison work with the public and the PVOs in a manner that would provide useful feedback to the Administrator. In Part II 3 below, we indicate what we believe might be a useful role for ACVFA.

12. PDC/PVC is currently funding a number of organizations not meeting the definition of PVO proposed above, and therefore not eligible to receive special benefits under any of the three grant mechanisms cited above. Disposition of these PVOs should be addressed on a case-by-case basis. Some such as SOLIDARIOS and Asia Foundation can be transferred to the cognizant regional bureau. Others such as New Transcentury and Planning Assistance might be justified as a means for making indirect Capacitating Grants to eligible PVOs. Still others, such as cooperatives and IESC involve a special relationship for AID. In general, however, and except for Matching Grants, we would expect a reduced level of general support grants funded through PVC. Further, we believe that PVOs receiving grants by exception should not have access to OPGs. Regardless of ineligibility for special benefits pursuant to the PD of May 1974, all PVOs would be eligible to receive traditional AID grants and contracts.

13. Responsibility for dealing with indigenous PVOs, not covered by our proposed criteria, would lie with regional bureaus and missions. In any event, we recommend no registration for indigenous PVOs beyond that required by law, i.e., when receiving subventions.

Should these recommendations warrant further consideration, we suggest that this be handled through an inter-bureau Task Force which would also consider other issues such as PVO activities in non-AID countries, and the degree to which OPG activities should conform to DAP fields of emphasis. At some subsequent stage, the PVO community should be brought into the picture. We believe that following such consultations, and once AID is prepared to articulate a policy and organization position with respect to PVOs, the Administrator should address the PVO community. Information copies of his statement, representing Agency policy, would then be passed to regional bureaus and missions for compliance.

II. Detailed Findings

1. Our central finding is that, in the absence of an operationally useful definition for a PVO, there can be no real communication within AID regarding an appropriate posture toward the PVO community.

In March 1974, the Administrator approved an Action Memorandum drafted by AA/PHA which defined the private and voluntary sector to include the following kinds of organizations:

> "1. Organizations that are philanthropic or service in purpose, deliberately non-profit, non-political, independent in policy, and non-governmental, and so recognized. These organizations fall into at least two categories:
>
> a. Organizations that are basically supported by voluntary contributions (underlining added) from their own constituencies or the general public; and/or
>
> b. Organizations that receive some direct financial assistance from AID for the specific support of programs or projects in the LDCs. These funds may constitute varying amounts of the budgets of these organizations, but in no case are they totally supported by AID funds.
>
> "2. Organizations that have been created under AID auspices and whose funds come totally or primarily from AID.
>
> "Exclusions: Not included in this definition are universities and other primarily educational institutions, labor organizations, private businesses, and groups organized specifically for political purposes."

The language of AID Handbook I dated December 12, 1975, is somewhat more concise and defines PVOs as:

> "nonpolitical, nongovernmental, nonprofit organizations, including cooperatives, that are philanthropic or service in purpose, excluding institutions whose primary purpose is educational or research."

The FAA contains no definition of a PVO, merely referring to "voluntary, nonprofit organizations registered with and approved by" the ACVFA. PVC contends, however, that an operating definition for PVOs is

implicit in the kind of organizations represented to be PVOs in the Congressional Presentation document, and for which AID support was approved by the Congress.

The report of a PVO conference held in Crystal City in November 1976, takes note of the lack of a definition for PVOs, and backs into the problem by listing certain criteria or characteristics which "suggest themselves:"

- be a juridical corporation
- have a private board of directors
- be subject to external audit
- sustain low overhead
- set its own criteria for programs
- be responsive to overseas clients.

A draft revision of AID Regulation 3 - Registration of Agencies for Voluntary Foreign Aid - dated September 1977, while not intended as a definition of a PVO, does state that:

> "an organization whose operations are primarily based in a less-developed country, but which has acquired a certificate of exemption from taxation as a nonprofit organization under the U.S. Internal Revenue Code or has a managing body, or board of director trustees, a majority of which are U.S. citizens, is considered to be a U.S. PVO."

In a draft paper prepared by White House staff covering Private Sector Involvement in International Health, note is taken of the diversity among PVOs, and the conclusion is drawn that "a comprehensive definition of PVOs, for all purposes and times is impossible."

We find the prevailing, open-ended definition of PVOs to be a serious impediment to coherent Agency decision-making and management effectiveness in implementing the Policy Determination of 1974. In our view, AID must find a way to disaggregate a heterogenous collection of organizations into a number of homogenous sub-groupings. Moreover, we believe that efforts to formulate a definition for PVOs must incorporate the concept of private and voluntary contributions. The Administrator's Memorandum of March 1974, cited above, makes reference to this point, but the concept is so fundamental as to warrant separate attention.

In this respect, it is only fair to note that a PHA/PVC paper submitted to ACVFA in October 1977, concedes that in embracing an open-ended definition for PVOs in 1974, PHA/PVC did not anticipate Congressional and other concerns now being expressed concerning the effects on volunteerism or heavy financial dependence on the government.

2. We find that the element of private and voluntary contributions represents an essential ingredient to any definition of PVOs.

Recently, the Director of the American Council of Voluntary Agency for Foreign Service, in writing on the subject of PVO diversity, provided the following definition of PVOs which he states "has stood the test of time":

> "nonprofit organizations established by a group of private citizens for a stated philanthropic purpose, and funded by voluntary contributions from individuals concerned with the realization of their purpose" (underlining added).

This basic concern with private contributions was reflected in a publication of the ACVFA titled, A Look to the Future, and released in conjunction with the Rosslyn PVO Conference of April 1974. Relevant extracts from that publication may be cited illustratively as follows:

(p. 15): "The extent to which the individual agency is able to give service is dependent primarily upon voluntary contributions and support from its constituencies or from the general public."

(p. 39): Refers to TAICH report of December 1972 regarding other donor country practices where . . . "grants are usually made on a matching basis, thereby generating a multiplier effect by adding voluntary contributions to appropriated funds."

(p. 101): A development thrust for PVOs "will require a major effort to educate those who contribute to U.S. voluntary agencies about development responsibilities overseas . . . . Constituency education must be undertaken as an integral part of the fund-raising process of all voluntary agencies."

(p. 113): "The word 'voluntary' refers to the support given to such organizations -- support, which is provided in a 'voluntary' way as a part of our American heritage". . . (to organizations which must be) . . . "vigilant lest either government controls or government largesse suffocate their traditions of selfless service and individual commitment."

Also in 1974, AID, ACVFA and the PVOs endorsed a publication to serve as a Guide for Audits of Voluntary Health and Welfare Organizations.

The preface to that document states that PVOs cover those organizations which "derive their revenue primarily from the general public" (underlining added).

During Senate Hearings on Foreign Aid in March, 1977, one PVO representative stated that:

> "more than any other single instrument, the PVOs reflect the generous spirit of the American people."

Another representative referred to PVOs as:

> "a direct link between the people of the Third World and the individual American who is concerned enough about the state of the planet to contribute money and time to its improvement."

Congressional concern over excessive PVO dependence on AID funding was raised in 1976 by the Senate Appropriations Subcommittee. An AID response to Senator Inouye dated June 13, 1977, concedes the potential danger to the integrity of PVOs from "excessive reliance on governmental support."

Even as PVOs make representation to the Congress for increased AID funding to PVOs, they also emphasize the principle of private and voluntary contributions.

We have belabored the matter of a definition for PVOs, and the notion of private and voluntary contributions because, in our view, these issues provide a relevant setting for subsequent findings dealing with PVO registration and the role of PDC/PVC.

3. We find no useful benefit accruing to AID from PVO registration or from the operating role currently assumed by the ACVFA.

With respect to PVO Registration, we had the benefit of an exhaustive study of this matter, prepared for AID and issued in January 1975. When the registration process was initiated in 1946, the purpose was to screen out marginal agencies and so reduce the chaos generated by a multitude of war relief groups seeking to obtain shipping space for their donations going overseas. The Advisory Committee of that time deliberately refused to associate registration with establishing the bona fides of any applicant agency. This was changed in 1947 when the USG began providing reimbursement to PVOs for ocean freight on relief goods shipped abroad. Reimbursement was limited to U.S. nonprofit organizations "registered with and recommended by" the ACVFA. In 1952, the word "recommended" was changed to "approved," and the implication of official endorsement for a registered PVO could not easily be avoided. By the late 1960s, only 30 PVOs were registered.

ACVFA then opened up registration to PVOs not seeking subventions, and the number of registered PVOs rose to 94. Many PVOs were simply seeking the status of official approval for their organization. In the interim, the State Department had assumed responsibility for refugee and immigration assistance, and PVOs could obtain this assistance without the formality of registration.

In June, 1976, the Senate Subcommittee on Appropriations responsible for Foreign Aid gave its support to channeling development assistance through PVOs as "an invaluable alternative to official development assistance." The Subcommittee cited as "perhaps, of greatest significance" . . . PVO activities which engage "the direct and voluntary participation of Americans in people-level programs" overseas. Reference was made to new registration conditions and documentation requirements, but this was seen as a mechanism for screening PVOs for suitability, and was to be accomplished by AID without impairing PVO independence or stifling "their ability to propose creative assistance programs." Finally, the Subcommittee envisaged registration as a vehicle for "reducing the heavy dependence of certain PVOs on AID grants" which up to this time has represented "an intractable problem." The Conference Report on Appropriations of September 1976, endorsed the ideas expressed by the Senate report, and in effect made registration a condition precedent to receipt of USG funds. To date, the ACVFA has registered and approved 125 PVOs. Another 33 applications are expected.

Under current AID practice, PVOs encompass those tax exempt organizations falling under IRS Code, Section 501(c)(3) for charitable organizations, under 501(c)(4) for social welfare organizations, under 501(c)(5) for cooperatives, and 501(c)(6) for credit unions.

Initially, this broad-based coverage for PVOs created some apprehension within ACVFA, which tended to associate PVOs with charitable organizations falling under Section 501(c)(3), the only category under which a U.S. private contributor may take a tax credit in filing his own income tax return.

ACVFA concern for the relevance of "private and voluntary" was expressed at its meeting of June 28, 1976. At that time it accepted the recommendation of one of its ad hoc groups which would confine eligible PVOs to organizations falling under Section 501(c)(3) since only this section "signifies the presence of a donative element." Instead, the making of grants to PVOs without regard to the donative element became institutionalized, with the result that AID must now contend with a self-inflicted wound.

In one case the Advisory Committee declined to register a PVO for failure to conform to the Committee's precept of a private and voluntary

agency. Perhaps this result was foreshadowed by the fact that the applicant PVO took the same position! In any event, at the ACVFA meeting of November 1977, the DAA/PHA distributed a statement which advised the Committee that, for purposes of registration, AID's position does not limit PVOs to organizations supported by private contributions. With this clarification, and pursuant to "entering an entirely new field," the ACVFA registered the PVO in question. It then proceeded to register several cooperatives which depend 100 percent for their overseas operations on AID financing.

At an earlier ACVFA meeting of January 10, 1977, PHA presented a position paper which stated that the purpose of registration was to determine minimum eligibility standards for PVOs. Registration was seen as but a first step in the transfer of AID resources to PVOs. A second stage would involve pre-grant award audits covering managerial capability and financial accountability. A third state would deal with specific program activities. Thus registration was seen to represent no more than a license to seek AID grants. The language of Conditions of Registration pertaining to financial resources and managerial capability was satisfied at this minimum level simply by PVO submission of required documentation. In this respect, PHA guidance to ACVFA points out that the viability of a PVO would, in any case, be determined by factors beyond "the mere financial test."

At the meeting of the ACVFA on August 2, 1977, the DAA/PHA stated his understanding that indigenous PVOs must be registered with the ACVFA in order to receive U.S. commodities or cash. Technically, the new legislation covers only subventions made available to foreign PVOs. However, PHA "as a matter of policy" was anxious to require registration for "all non-U.S. PVOs receiving assistance under Sections 102-106 of the FAA." Procedurally, the ACVFA would register foreign PVOs automatically when AID/STATE certifies a foreign PVO as eligible to receive USG grant assistance.

As a final observation on registration, we endorse the finding of the 1975 study on registration referred to above; namely that registration is irrelevant to the way AID does its business; that AID grants are made on the basis on criteria and considerations beyond the purview of the ACVFA. In the light of this finding, it is not self-evident why AID should devote staff resources to an exercise which is both perfunctory and ritualistic and may serve only to provide official blessing to an applicant PVO.

Early in 1977 AID was required to justify to OMB continuation of ACVFA. In its "justification," AID made reference to a number of "advisory" functions performed by the ACVFA. Although these functions appear not to have been fully carried out, the question does arise regarding a possibly useful role for an ACVFA relieved of its current operating role of registration.

A PHA/PVC paper of December 1976 addressed this matter and offered an ACVFA agenda for the future as follows:

a. counsel AID, the State Department, and the Executive Branch generally on the policies which should govern programs involving voluntary agencies and the Government;

b. review such programs with the view to suggesting modifications, changes, etc., designed to improve them;

c. assess the tenor of the independent voluntary sector and its reaction to government programs engaging or assisting voluntary agencies in overseas activity;

d. counsel on the guidelines and evaluation criteria to govern AID-financed programs involving voluntary agencies;

e. act as ombudsman for the community of voluntary agencies with AID;

f. suggest new and innovative approaches to programs involving voluntary organizations;

g. foster public interest in the field of foreign assistance and the activities of private and voluntary organizations.

We generally endorse these proposals and believe it might be appropriate for ACVFA to assess how well PVC and other elements of AID relate to PVOs. However, preliminary to any further exploration of an altered role for the ACVFA is the need for a better focus precisely on how AID is to "encourage greater participation" of PVOs in the development process.

4. We find that PDC/PVC is trying to march to the beat of too many drummers as it seeks to operate as chosen vehicle within AID for relating to the PVO community.

The 1974 Policy Determination to encourage and enhance the role of PVOs in overseas development can be interpreted to mean that a component of AID's overall program should be PVO-centered, rather than LDC-centered. This is a vital and sensitive distinction which, in the interest of intra-Agency harmony, appears to have been finessed during the past three years. If carried to the extreme, AID support to PVOs for New Directions activity could be treated almost as an end in itself, with benefits flowing to the LDCs a secondary matter. In this configuration, the PVOs would look to AID simply as a resource. An opposite position would hold that PVOs represent potentially useful instruments for the pursuit of AID-determined programs.

a. PVC Functions - According to the AID Organization Handbook, PVC "was set up to create and explore approaches to enlarge the role of voluntarism." This task, however, when placed in conjunction with PVC responsibility for formulating Agency policy on PVO participation, suggests at least the potential for a conflict of interest. This follows even if the idea of "creative tension" were accepted as an inherent element of the PVC modus operandi. Specifically, we are uneasy that PVC wishes to establish "criteria for OPG projects administered by the other bureaus."

In FY 1977, PVC support to PVOs involved the processing of 58 grants and contracts totaling $23.2 million. This places PVC in a significant operating and advocacy role, and compares with OPG funding for all four regional bureaus totaling $20.4 million. Immediately the question of an appropriate balance between central and regional funding for PVOs comes into play.

When the PVC burden of registration and project formulation is also taken into account, little time remains for PVC to perform other functions which we find to be of high priority. Here we have in mind evaluation of overall PVO performance, and of assessing PVO financial and managerial capabilities, both tasks which would contribute to the availability in AID of an information system pertaining to PVO activities. We would also envisage a parallel, priority task for PVC; namely, serving as ombudsman to the PVO community, including performing a brokerage function between PVOs and the regional bureaus.

We see the establishment of the new Bureau for Private and Development Cooperation (PDC) as an opportune time to reexamine the content and priority of PVC functions. Such reexamination will need to take into consideration the Administrator's recent message to the field which makes "decentralized management . . . a cardinal operating principle for AID . . . ." This need not, of course, deny to PVC a consciousness-raising role within AID on behalf of PVO involvement in the development process overseas.

b. Specific Grants - Even though a grant is in the nature of a gift in support of an agreed-upon purpose, a specific grant is intended to limit flexibility in use. The DPG program is one specific grant which was designed to assist PVOs in improving their capacity to plan, formulate, manage and evaluate development programs overseas. This "capability" was intended to be reflected in institutional and personnel terms, as well as in the ability of the PVOs to attract outside sustaining resources.

We are satisfied that, in most cases, DPGs did in fact accomplish their purpose, and that exceptions do not necessarily reflect on PVC screening. Not surprisingly, however, a number of tension points have

been experienced in implementing the DPG program. To some extent DPGs have been used to develop projects which are then submitted to regional bureaus and missions for OPG funding. This sort of PVC-induced project generation has come in for some criticism by the regional bureaus and raises the question of appropriate limits to centrally-funded activities. Even though regional bureaus are regularly consulted with respect to proposed DPGs, PVC has taken the position that resolution of conflicting views is within the authority of AA/PDC, unless challenged by the regional bureaus at the AA level. In practice, only a few cases were resolved by the Deputy Administrator. In general, PVC has argued that DPG guidelines reflect a position "full of compromise and consensus attempts" and, accordingly, that no advantage accrues from treating guidelines as regulations, or "fashioning fine distinctions between DPGs and OPGs."

For FY 1977, PVC approved 33 DPGs for a total value of $7.5 million. For FY 1978, the Congressional Presentation shows 17 DPGs in the amount of $4.0 million. Even though the DPG program was advanced as a three-year effort, PVC now is of the view that for several PVOs further assistance of this type is required. At one point PVC was prepared to respond to PVO recommendations at the Crystal City Conference and to recommend "transition" grants to selected PVOs "in need." More recently, PVC has sought to absorb the transition grant concept into a "more flexible and stable" type institutional support grant. This latest approach will be further discussed below.

c. General Grants - We find that this component of the PVC program totaling over $15 million for FY 1977 poses several policy and management issues. In this respect, we treat general support grants as a form of budgetary support, with AID funds commingled with PVO funds. Variations in nomenclature encompass other expressions such as "core" grants, "matching" grants, "sustaining" grants, "consolidated" grants, and more recently to "institutional" grants. These centrally-managed general grants threaten to create dependency, and often impinge on regional bureau and mission programs.

Recently PPC requested data regarding "core" grants. The PVC response showed an intent to obligate $20 million for such grants in FY 1978 to 24 PVOs. This report to PPC included core support grants to several cooperatives reaching up to 100 percent of overhead costs, but also to cover overall program costs to several PVOs deemed to exist as a result of a- earlier U.S. initiative. These include Asia Foundation, IESC and OICI. PVC provided $1.1 million of general support to AFRICARE in FY 1977. However, this PVO has been transferred to the Africa Bureau for funding in FY 1978.

Even though several PVOs fall into a "hot house" category, AID has been successful in resisting pressures by the Congress that would prohibit AID from funding more than 50 percent of PVO overhead costs. The intractability of this dependency problem may be demonstrated by example. In June 1964, IESC addressed a letter to AID expressing appreciation for an AID "grubstake," and stated "an intention" that need of AID assistance would cease at the expiration of three years. Now, after three years plus ten, PVC is still funding IESC, in the amount of $4.1 million for FY 1977!

In commenting above on the DPG program, we referred to regional bureau concern with PVOs using such funds to finance project development costs, and then levying a subsequent claim on the cognizant regional bureau for OPG funds. Regional bureau concern is, however, most prevalent in the case of general support grants which are often explicitly available to cover "operational costs" which encompass project development costs. For those regional bureaus, anxious to coordinate OPG resources with their own on-going bilateral programs, this PVC practice often constitutes an irritant.

A letter to Senator Inouye, defending the use of general support grants, stated that "AID makes no distinction between funds attributed to program costs and those for administrative and related overhead costs."

As noted above, a variation of the general support grant which we favor is the "matching" grant, available to those PVOs wishing "to undertake projects outside the OPG system." In practice, these are program grants. The degree of freedom from AID control would depend on the ability of the affected PVO to generate a substantial portion of total project costs. PVC already administers a number of these matching arrangements. In the case of PACT, host country contributions to project costs are treated as a part of "matching" funds. On this basis, the PACT "contribution" amounts to 50 percent. If, however, only U.S. private contributions were counted, the PACT contribution would fall to 30 percent. Under some arrangements all matching funds pass through the financial accounts of the PVO. For others this is not done. In the case cited above, U.S. private contributions are not run through PACT accounts. In consequence, the PACT income statement shows AID support in an exaggerated amount of 95 percent. In principle, the matching grant arrangement would require PVOs to keep segregated accounts, excluding domestic programs in the U.S., and relief programs overseas. We find the matching grant arrangement a potentially viable concept for PVOs wishing to operate without project review by regional bureaus and field missions, while acknowledging that some bureaus and missions will object to such freedom. This matching arrangement, with its commingling of PVO and AID funds, also might represent a useful device when U.S. and PVO interests dictate that PVOs not be too closely associated with U.S. funding.

As a final observation, we take note of a DSB/PDC draft memorandum which would introduce a centrally-managed institutional grant. Such institutional grants would be available to PVOs found by PVC to have "demonstrated competence," and which exhibit "an intent to become financially self-sustaining" over a three-year period. It appears that the proposed institutional grant would include operational costs, presumably including the costs of developing OPG proposals. Institutional grants would be separate and different from general support grants now being made to those "hot-house" PVOs stated to be of special interest to AID.

d. Centralized vs. Decentralized Dealings with PVOs - From time to time the PVO community expresses a desire for AID to have a one-stop office which would provide funding, and engage in a "partnership" dialogue. More realistically, the PVOs recognize the legitimate role of the regional bureaus and missions. Particularly for large OPG projects, as now contemplated for Africa, the PVOs recognize that differences between a "theirs" and "ours" dichotomy becomes blurred. In other words, the larger the PVO proposal, the less PVO autonomy.

In another context, we believe that PVO frustration is not unrelated to the politics of grantsmanship. If the PVOs perceive themselves to be a kind of constituency for AID with the Congress, and if AID shares this perception, then the potential of AID becoming hostage to the PVO community cannot be shunted aside. In our view, the problem is inherent in any AID/PVO relationship.

In general, we are not disposed to expect magic solutions stemming from a centralization-decentralization debate. Instead, we would try to isolate areas for interaction. The PVO community, for instance, tends to stress its great potential for involvement in development work overseas; all that is needed is a bit of help from AID. Practitioners in AID, however, focus on the actual capacity of PVOs, and see scope for only limited expansion. This intellectual stalemate is compounded by a parallel stalemate regarding the significance of fund raising. Although PVOs pay homage to the virtues of self-reliance, in practice they confront a cold world of declining donations, as the individual American relates his charity to his IRS tax payment.

Under the guise of a "partnership" relation with AID, it appears that the PVO community would have AID use its own funds to close the gap between PVO capacity for performance, and PVO capacity for private fund raising. In effect, the magnitude of the AID grant would be sufficient to cover any effort "beyond that which a PVO could otherwise carry out from its own resources." Thus, from the PVO point of view, the issue is not one of dependency on AID, but the dependability of AID! This

kind of rationalization can have validity, depending on the premise from which one starts. Accordingly, once again, we find a need for AID to focus on the basic problem of differentiating between PVOs as an AID instrument on the one hand, and AID as a resource to PVOs on the other.

5. Overseas PVO activities

The findings below were developed from field study of PVO projects in Colombia and Indonesia.* Although the findings have general application, or at least relevance, PVO activities in Colombia and Indonesia were chosen not because they constitute a cross section of projects, but rather because they represent reasonably advanced programs from which we could learn and generalize.

a. AID supports PVOs in part on the premise that PVOs can reach and involve beneficiary groups in local communities through growth-with-equity projects of a character which AID cannot undertake as well, if at all. We found this proposition to be generally valid. The comparative advantage of PVOs rests on: 1) substantial numbers of well-trained and experienced American and host country micro-developers willing and able to work at village level project sites for extended periods of time; 2) greater operational freedom. PVOs are less visible and their focus of action is further removed from national government authority and oversight; and 3) more opportunities for fruitful experimentation. Through small scale, low-cost "starter" projects, PVOs can experiment with different developmental approaches with greater flexibility than AID or IFIs. Project problems and setbacks tend to be localized and resource transfers small. Those projects which prove successful are candidates for replication, perhaps on a larger scale, by others.

b. Most of the PVOs receiving AID support through OPGs and DPGs have moved from their traditional emphasis on welfare and relief activities to programs of micro-development geared to specific target groups in the poor majority. This cumulative change is manifestly more than cosmetic, though it is too early to appraise its development impact. Among the more perceptive and thoughtful PVO field officials, there is concern over how to move from target of opportunity tactics to strategies of micro-development which can be replicated or adapted on a wider scale.

c. Micro-development activities by PVOs, however successful, are not substitutes for larger scale National Government development

*A more detailed and extensive report on PVO programs in Colombia and Indonesia also has been prepared for the use of PHA/PVC and the regional bureaus.

programs which AID may support and which are also directed to target groups in the poor majority. The PVOs have a significant development role to play, particularly by stimulating structural economic and politico-social changes from the bottom upward in the developing countries. However, given economies of scale, traditional political structures, and the dominant role of national government policies and programs in the development process, it is unrealistic to expect PVOs to be more than one instrument to promote change, triggering other internal and external sources of action and resources.

d. PVO-sponsored community development projects become effective and gather momentum only when project goals and aspirations are internalized. The community must embrace the development activity as its own if success is to be achieved. Although this prescript is virtually axiomatic in the PVO community, the challenge is how to go about actually accomplishing it. Different PVOs have different approaches. While the dynamic of change is thus fundamentally internal, the record shows that it can be sparked by a variety of different actions -- new infrastructure, better markets, community leadership training, cheaper credit, etc. There is no predictable or necessary sequence to the development process at the local level.

e. AID should encourage and assist the PVOs in the development of their project evaluation capacities. If one of the major pay-offs in supporting PVOs is their capability to innovate and experiment with different approaches or strategies of micro-development, then increased attention must be given by both AID and PVOs to the evaluation of the results of the experimentation. With few exceptions, project evaluations and the development of staff evaluation skills were not receiving the priority they deserve among the PVOs resident in Colombia and Indonesia.

f. The issue of PVO freedom "to do its own thing" versus AID program control over PVOs appears not to be an important factor in actual field relationships. In fact, the more effective and significant projects appear to be those where the PVOs and USAIDs collaborated on project development and maintained continuing dialogue during project implementation. In both Colombia and Indonesia, PVO and USAID staffs on the whole have cooperative and constructive relations.

The roles of the USAID and the PVO should be viewed as complementary rather than competitive. The two represent different institutional instruments addressing different dimensions of the development process. Changes in attitude on the relations between PVOs and AID to reflect better this perspective are needed among officials on both sides, particularly in the United States.

g. There is too much parochialism among the individual PVOs in the host country. The PVOs do not talk to each other enough. There are substantial information gaps between them with regard to what each is doing. Little attention is given to exploring areas of common interest or activities where they could cooperate or perhaps pool resources.

The USAID could play a useful, low-key role in bringing PVOs together informally to facilitate the exchange of information and some coordination of efforts. This could also be accomplished through a "networking" of PVO activities, and through multi-country conferences. Also, USAID reviews of proposed OPGs can sometimes be an effective means of accomplishing the same purposes.

h. The USAID should have a clearly identified coordinator of PVO projects in the Mission. This whole approach would appear to be much better than having PVO projects handled in spare moments, by different USAID technicians in the subject matter divisions of the Mission. PVOs need a central point of contact in the USAID who can involve appropriate USAID technicians as required. As a USAID's OPG program grows in size and scope, this should become a full-time job for one or more USAID employees. USAID/Indonesia's arrangement of a separate office for PVO relations should be carefully studied with a view of using it in other USAIDS -- at least in those that have, or aspire to have, substantial PVO programs.

i. USAIDs must weigh the trade-offs, often on a case-by-case basis, in deciding whether to provide direct support to indigenous PVOs. Direct support can encourage the growth of indigenous organizations capable of effective development work in local communities. In this way, it can also encourage local resource mobilization and popular participation in development. But other considerations have to be taken into account. The advantages to a USAID of having a U.S. intermediary which it can hold accountable would be forfeited by direct funding of an indigenous PVO. Extensive bypassing of U.S. PVOs could weaken support for foreign assistance by their domestic constituencies in the United States. Finally, the USAID is vulnerable to error in deciding which indigenous PVOs to support. Selecting an organization which, for example, became anti-host government in executing a project could set off a chain reaction threatening the entire PVO support program. USAIDs in Colombia and Indonesia are thus correctly proceeding with caution in developing programs of direct support to indigenous PVOs. Opinion within AID and among PVOs is divided concerning the extent to which AID should directly support indigenous PVOs, and to what extent U.S. PVOs should play an intermediary role.

ATTACHMENT A

FY 1977 OBLIGATIONS OF AID-ADMINISTERED FUNDS IN SUPPORT OF PVO ACTIVITIES[1/]
(in millions)

Subventions		$ 355.0
Title II Commodities		264.2[2/]
Shipment of Title II Commodities		79.2[2/]
Ocean Freight on Donated Goods		4.3
Original Cost Value of Excess Property		7.3
Operational Program Grants (OPGs)		20.4
Latin America		3.4
Africa		4.6
Near East		7.5
Asia		4.9
PHA/PVC Programs		23.2
Development Program Grants (DPGs)		7.5
Other Support Grants to PVOs		15.7[3/]
Other Grants to PVOs		66.1[4/]
PVO Contracts		19.7
	Total	$ 484.4[5//]

1/ Includes both U.S. and indigenous PVOs, registered and non-registered.

2/ CARE and CRS account for over 95 percent of the Title II program.

3/ Includes $1.6 million of contracts.

4/ This is a residual figure, derived by adding to a Data Management Printout total of $101.9 million, $7.8 million representing predominantly OPG grants known to have been made in FY 1977 but not shown in reference Printout, less $20.4 million shown for OPGs and $23.2 of PHA/PVC obligations. This residual of $66.1 million encompasses an unscreened listing of PVOs, and includes $35.4 million of PHA/POP grants. Other significant grants cover $4.0 million of Disaster Relief through CARE for Turkey, $6.6 million to labor organizations, and $3.0 million to the International Committee of the Red Cross. Another example is $2.2 million for CRS, over and above that included under OPG/PVC grants shown above.

5/ This figure may be treated as supplemented by up to $250 million of U.S. private contributions to registered PVOs for use in LDCs.

ATTACHMENT B

TOTAL AID FY 1977 GRANTS TO LARGER PVOs 1/
(in $ thousands)

CARE - Cooperative American Relief Everywhere:

Country	Grant Amount	Grant Number
Peru	$ 220.0	0177-G-T
Chad	192.0	G-1371
So. Asia	30.0	G-1266
Tunisia	345.0	G-1350
Tunisia	112.7	G-1432
Chad	337.0	G-1579
Free W.	154.9	G-1470
Haiti	69.2	135-T
Tunisia	266.5	G-1295
Guatemala	35.0	84-T
Sierra L.	505.8	G-1154
Bangladesh	417.0	G-1171
Korea	187.0	G-1198
Indonesia	238.0	G-1232
Turkey	4,000.0	G-1568
Chad	603.6	G-1556
Bolivia	300.0	n.a.
Colombia	92.0	n.a.
Costa Rica	80.0	n.a.
Guatemala	35.0	n.a.
Total	$ 8,607.0	

CRS - Catholic Relief Services

Haiti	$ 44.0	G-1209
NE & SA	1,100.0	G-1437
Morocco	144.5	G-1392
Tunisia	80.0	G-1431
Jamaica	83.0	G-1192
Indonesia	67.7	10-G-T
"	29.6	7-G-T
"	29.6	8-G-T
"	98.6	9-G-T
Lebanon	700.0	G-1533
Afr. Regional	220.0	G-1567
Indonesia	8.8	77-4-T
Indonesia	7.5	77-4-T
Columbia	400.0	G-1117
Worldwide	386.0	G-1137
Haiti	6.1	n.a.
"	5.0	n.a.
"	14.0	n.a.
Bolivia	39.0	n.a.
Yemen	135.0	n.a.
Portugal	1,000.0	n.a.
Total	$ 4,598.4	

SCF/CDF - Save the Children & Community Development Foundation

Country	Grant Amount	Grant Number
Bangladesh	$ 184.0	G-1224
Comeroon	142.0	G-1375
NE & S. Asia	712.2	G-13-3
Indonesia	242.4	109-T
Yemen	1,040.0	G-1449
Lebanon	400.0	G-1436
Tunisia	617.0	G-1438
Worldwide	324.7	G-1371
E.Asia Regional	444.5	G-1165
Worldwide	400.0	G-1113
Colombia	154.0	n.a.
Dom. Republic	97.0	n.a.
Honduras	56.0	n.a.
Yemen	615.0	n.a.
MEF/NE	769.0	n.a.
Total	$ 6,197.8	

1/Note: PVO contact with AID is influenced both by current year funding and by implementation of projects funded in prior years. These grants include Disaster Relief and other grants in addition to DPGs and OPGs. Subventions, however, are excluded.